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Attorneys for Defendants

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

THOMAS FLAMSON and JIN CHUNG,
individually and on behalf of all others similarly
situated,

Plaintiffs,

v.

SONY CORPORATION OF AMERICA, SONY
COMPUTER ENTERTAINMENT AMERICA
INC., SONY COMPUTER ENTERTAINMENT
AMERICA LLC, SONY ONLINE
ENTERTAINMENT LLC, SONY NETWORK
ENTERTAINMENT INTERNATIONAL LLC,
and SONY NETWORK ENTERTAINMENT
AMERICA INC.

Defendants.

Case No. 3:11-cv-02456-JSW

**STIPULATION AND ~~PROPOSED~~
ORDER TO VACATE CASE
MANAGEMENT CONFERENCE
AND ASSOCIATED DEADLINES**

Judge: Hon. Jeffrey S. White

**STIPULATION TO VACATE CASE MANAGEMENT CONFERENCE AND
ASSOCIATED DEADLINES**

1. Defendants Sony Corporation of America (SCA), Sony Online Entertainment LLC (SOE), Sony Computer Entertainment America LLC (SCEA), Sony Network Entertainment International LLC (SNEI), and Sony Network Entertainment America Inc. (SNEA), as well as certain related entities (collectively, the “Sony Defendants”), have been named as defendants in at least sixty-two (62) putative class action lawsuits, including this lawsuit, to date;

2. A motion is currently pending before the Judicial Panel on Multidistrict Litigation (the “JPML”) to centralize this and other matters before a single district court, to which multiple responses, including the Sony Defendants’ response, have been filed to date and are under submission before the JPML, with a hearing date of July 28, 2011;

3. The current date of the initial Case Management Conference (“CMC”) in this case is August 26, 2011 and certain other deadlines are set forth in the Order Setting Initial Case Management Conference and ADR Deadlines;

4. The parties agree that it is in the best interests of all parties to vacate the CMC and associated deadlines in this case in order to facilitate the scheduling of this matter in coordination with the schedule for the motion and hearing before the JPML;

NOW, THEREFORE, all parties, by and through their respective counsel, hereby stipulate for an order as follows:

In light of the motion for centralization pending before the JPML, the CMC and all associated deadlines, including those set forth in the Order Setting Initial Case Management Conference and ADR Deadlines, in the above-entitled action shall be vacated and further pretrial and scheduling matters shall be addressed by the transferee judge following centralization or, in

the event such motion for centralization is denied, the defendants will notify the Court within 7 days after such denial, so that the Court may at that time issue a revised case schedule.

Dated: July 27, 2011

ANDREW JOSEPH SOKOLOWSKI
DAVID LISHIAN CHENG
MIRIAM LEIGH SCHIMMEL
INITIATIVE LEGAL GROUP APC

By: /s/ Andrew J. Sokolowski /s/ [as authorized]
Andrew J. Sokolowski

Attorneys for Plaintiff
THOMAS FLAMSON
JIN CHUNG

Dated: July 27, 2011

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Rocky C. Tsai

Attorneys for Defendants
SONY COMPUTER ENTERTAINMENT
AMERICA LLC and
SONY NETWORK ENTERTAINMENT
INTERNATIONAL LLC

[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: July 28, 2011

By: 
U. S. District Court Judge